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3 District of Nevada
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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,) 2:16-CV-2067-KJD-(CWH)
12 Plaintiff,)
13 v.) United States' Unopposed Motion to
14 \$25,000.00 IN UNITED STATES Continue the CAFRA deadline and Order
CURRENCY,)
15 Defendant.)

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17 The United States of America respectfully moves this Court to grant a thirty-day
18 extension of the CAFRA deadline, which, in the above-captioned case, obligates the Government
19 to file its complaint for forfeiture, *in rem*, no later than September 6, 2016. Under the procedural
20 rules of civil forfeiture, codified at 18 U.S.C. § 983, once a putative claimant files an
21 administrative claim with the seizing agency, the United States has ninety days to commence a
22 civil forfeiture action

23 For its grounds, the United States says that it appears from a preliminary investigation of
24 this matter that this case will be resolved without the need to file a forfeiture complaint *in rem*.
25 The defendant currency in this case was obtained by Barbara Dooley, through her fraudulent
26 representations to Jean Christensen. While Ms. Christensen (the person that the Government

1 believes to be the victim in this case) has filed an administrative claim to the currency, Ms.
2 Dooley, (the alleged wrong-doer) has not. The Government needs an additional thirty days
3 beyond the CAFRA deadline of September 6, 2016, in which to investigate whether there are any
4 other victims who might be entitled to some or all of these seized assets. As noted, the
5 Government's preliminary assessment is that Ms. Christensen is the sole victim. But the
6 Government needs the additional time to conduct its due diligence on this matter.

7 On August 26, 2016, undersigned government counsel spoke to Jean Christensen on this
8 matter on and Ms. Christensen gave Government counsel permission to inform the Court,
9 through this motion, that she consents to this motion.

10 This motion is not submitted solely for the purpose to delay or for any other improper
11 purpose.

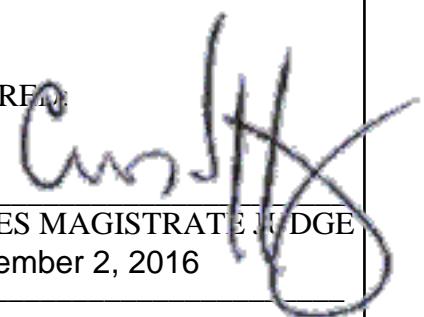
12 WHEREFORE, the United States moves this Court to grant its motion to extend the time
13 for the United States to file its complaint in this matter an additional thirty (30) days; or until
14 October 6, 2016.

15 DATED this 31st day of August, 2016.

16 Respectfully submitted,

17 DANIEL G. BOGDEN
18 United States Attorney

19 /s/ Michael A. Humphreys
MICHAEL A. HUMPHREYS
20 Assistant United States Attorney

21 IT IS SO ORDERED:
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24 UNITED STATES MAGISTRATE JUDGE
September 2, 2016
25 DATED: _____
26

CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing United States' Unopposed Motion to Continue the CAFRA deadline was made by sending a copy of same by first class mail, addressed to the following addressee, on this 31st day of August, 2016:

Jean Christensen
8541 35th Avenue
Kenosha, WI 53142

/s/ Michelle C. Lewis
MICHELLE C. LEWIS
Paralegal Specialist